

APPLE AMERICAN GROUP, LLC and
APPLE NORCAL, LLC
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APPLE AMERICAN GROUP, LLC and
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Attorney for Plaintiff CAESAR OSKAN

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CAESAR OSKAN, individually, on behalf
of all other similarly situated persons, and
on behalf of the California Labor and
Workforce Development Agency and the
State of California,

Plaintiffs,

v.

APPLE AMERICAN GROUP; APPLE
NORCAL, LLC; and DOES 1-20,

Defendants.

No. C 08-04722 SBA

**STIPULATION TO EXTEND TIME
TO FILE RESPONSIVE MOTIONS
RELATED TO (1) DEFENDANTS'
MOTION FOR PARTIAL
SUMMARY JUDGMENT, (2)
PLAINTIFF'S MOTION FOR
SUMMARY JUDGMENT, AND (3)
PLAINTIFF'S MOTION FOR
CLASS CERTIFICATION**

Date:

Time:

Judge: Hon. Sandra Brown Armstrong

Trial Date: July 12, 2010

Pursuant to Local Rule 6.2(a), the parties hereby stipulate to an extension of time in
which the parties must file documents in response to outstanding dispositive motions.

STIPULATION TO EXTEND TIME TO FILE RESPONSIVE MOTIONS RELATED TO (1) DEFENDANTS' MOTION FOR
PARTIAL SUMMARY JUDGMENT, (2) PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT, AND (3) PLAINTIFF'S
MOTION FOR CLASS CERTIFICATION

RECITALS

1. On May 24, 2010, the parties appeared at a Court-mandated settlement conference before Judge Edward M. Chen. The parties have tentatively agreed to a settlement in this case, subject to agreement by the all parties and a signed settlement and release.

2. May 25, 2010, is the deadline for Defendant's to file (1) Reply of Plaintiff's Opposition to Defendant's Motion for Partial Summary Judgment, (2) Opposition to Plaintiff's Motion for Summary Judgment, and (3) Opposition to Plaintiff's Motion for Class Certification.

3. June 1, 2010, is the deadline for Plaintiff's to file (1) Reply to Defendants' Opposition to Plaintiff's Motion for Class Certification and (2) Reply to Defendant's Opposition to Plaintiff's Motion for Summary Judgment.

4. In light of the parties' tentative settlement agreement, the parties hereby request an extension of two days in which to file required responsive motions.

STIPULATION

Pursuant to Local Rule 6.2(a), the parties hereby stipulate that Defendants' Reply to Plaintiff's Opposition to Defendants' Motion for Partial Summary Judgment, Defendants' Opposition to Plaintiff's Motion to for Certification and Opposition to Plaintiff's Motion for Summary Judgment shall be due on May 27, 2010. Plaintiff's replies to Defendants' Opposition to Plaintiff's Motion to for Certification and Opposition to Plaintiff's Motion for Summary Judgment shall be due on June 3, 2010.

DATED: May 24, 2010

PERETZ & ASSOCIATES

By: _____/s/

Yosef Peretz

Emily A. Knoles

Michael D. Burstein

Attorney for Plaintiff CAESAR OSKAN,
individually, on behalf of all other similarly
situated persons, and on behalf of the California
Labor and Workforce Development Agency and

STIPULATION TO EXTEND TIME TO FILE RESPONSIVE MOTIONS RELATED TO (1) DEFENDANTS' MOTION FOR PARTIAL SUMMARY JUDGMENT, (2) PLAINITFF'S MOTION FOR SUMMARY JUDGMENT, AND (3) PLAINTIFF'S MOTION FOR CLASS CERTIFICATION

the State of California

DATED: May 24, 2010

By: _____/s/
Melissa Griffin
Attorney for Defendants APPLE AMERICAN
GROUP, LLC and APPLE NORCAL, LLC

STIPULATION TO EXTEND TIME TO FILE RESPONSIVE MOTIONS RELATED TO (1) DEFENDANTS' MOTION FOR
PARTIAL SUMMARY JUDGMENT, (2) PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT, AND (3) PLAINTIFF'S
MOTION FOR CLASS CERTIFICATION